

Provider Compliance Group Special Open Door Forum

April 19, 2018

3:00-4:00 pm Eastern Time

Conference Call

Participant Dial-In Number: 1-(800)-837-1935

Conference ID: 9796898

Melanie Combs-Dyer
Director, Provider Compliance Group
Center for Program Integrity
Centers fort Medicare and Medicaid Services

Medical Review Documentation Compliance and Technology Contract

- CVP, Fairfax, VA 22030 <u>www.cvpcorp.com</u>
 - Tasked with providing services to facilitate health care providers' medical record documentation and Medicare contractors' review of medical record documentation.
 - Mechanism:
 - Templates and Clinical Data Elements to assist providers in improving documentation.
- Participating CVP technical support for this SODF:
 - Dr. Mark Pilley, Medical Director, StrategicHealthSolutions
 - Robert Dieterle, CEO EnableCare, LLC

Agenda

- Introduction and Background Melanie Combs-Dyer
- Overview of Templates and Clinical Data Elements Robert Dieterle
- Q&A Melanie Combs-Dyer Robert Dieterle Dr. Mark Pilley

Background on Improper Payment for Respiratory Related Items (FY 2017 CERT Report)

- Positive Airway Pressure (PAP) Device for Obstructive Sleep Apnea (OSA)
 - Improper payment rate: 59.0 % (495 million dollars)
 - 87.8 % due to incomplete documentation
- Respiratory Assist Device (RAD)
 - Improper payment rate: 62.7 % (72 million dollars)
 - 95.0 % due to incomplete documentation
- Ventilator
 - Improper payment rate: 57.4 % (192 million dollars)
 - 25.4 % due to incomplete documentation
 - 58.0 % due to medical necessity

The draft Respiratory Related Item Templates and the associated Clinical Data Elements (CDEs) are available on the CMS.gov website which can be accessed through the link below:

https://www.cms.gov/Research-Statistics-Data-and-Systems/Computer-Data-and-Systems/Electronic-Clinical-Templates/DMEPOS-Templates.html

Positive Airway Pressure (PAP) Device for Obstructive Sleep Apnea (OSA)

Order -- CDEs Draft R1.0c 4/12/2018 -- Template Draft R1.0c 4/12/2018 F2F Encounter -- CDEs Draft R1.0c 4/12/2018 -- Template Draft R1.0c 4/12/2018

Respiratory Assist Device (RAD)

Order -- CDEs Draft R1.0b 4/12/2018 -- Template Draft R1.0b 4/12/2018

F2F Encounter -- CDEs Draft R1.0b 4/12/2018 -- Template Draft R1.0b 4/12/2018 Lab Test Results -- CDEs Draft R1.0b 4/12/2018 -- Template Draft R1.0b 4/12/2018

Appendices -- Appendices A&B R0.1b 4/12/2018

Ventilator

Order -- CDEs Draft R1.0a 4/12/2018 -- Template Draft R1.0a 4/12/2018

Progress Note -- CDEs Draft R1.0a 4/12/2018 -- Template Draft R1.0a 4/12/2018

Also available:

CMS presentation slides to be used in support of the Special Open Door Forum conference call, "Respiratory Related Item Templates and Clinical Data Elements (CDEs)", held on April 19, 2018; 3:00-4:00 pm Eastern Time.

What are Clinical Data Elements?

Definitions of the content of individual "fields" in a template

Each CDE has the following characteristics:

- Unique identification (e.g. PDN01, PND02)
- Name (e.g. Patient Name, Date of Birth)
- Data type (e.g. text, date, number, value from a set)
- Selection type (e.g. single, multiple)
- Value Set (list of allowed selections) (e.g. Items to orders, diagnoses)

PBD: Patient/Beneficiary Demographics

PBD1: Patient's first name, last name and middle initial (text)

PBD2: Patient's date of birth (date: MM/DD/YYYY)

PBD3: Patient's Gender (Single selection from the value set: M/F)

PBD4: Patient's Medicare ID (Medicare ID format and check digit)

PND: Provider/NPP Demographics

PND1: Provider or Allowed NPP first name, last name, middle initial and suffix (text)

PND2: Provider NPI (Numeric with check digit)

PND3: Provider Telephone Number (xxx-xxx-xxxxx ext xxxx)

PND4: Provider Direct address (Direct address)

Use of Color and Font for Templates and CDEs

- 1) CDEs in black Calibri are required
- 2) CDEs in burnt orange Italics Calibri are required if the condition is met
- 3) CDEs in blue Times New Roman are recommended but not required

General Template and CDE Information

USE of templates and CDEs

- Medicare does not require the use of these templates and CDEs for reimbursement for Respiratory Related Items.
- CDEs are designed for incorporation into provider EHR templates used to collect information during a patient encounter, recording laboratory results, and placing an order.
- Optional elements are present to assist providers in documenting the encounter and recording any pertinent information.
- Templates are visual representations of the CDE and may be printed, completed and made part of the patient's medical record in the event the provider does not have an EHR or the EHR does not support the elements to show that respiratory related item is medically necessary and appropriate based on Medicare documentation requirements.

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
 - Patient information
 - F2F or in- person provider information
 - Date of F2F or \in-person evaluation
 - Diagnosis
 - Start date if different from date of order
 - Type of order
 - *Device order* / specific HCPCS code
 - Supply / Accessory Order
 - Signature, name, date ordered and NPI (for WOPD)

Respiratory Related Items F2F Encounter Template and Clinical Data Elements (CDEs)

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
 - Patient information
 - Encounter information
 - Diagnoses
 - Current sleep study results (if available) (specific to PAP, RAD)
 - Qualifying observations (specific to PAP, RAD, Ventilator)
 - Chief complaint and related past medical history
 - Medications
 - Allergies
 - Review of Systems (variation based on specific device)
 - Physical Examination (sections required for PAP and RAD)
 - Assessment
 - Treatment plan
 - Orders
 - Signature, name, date, and NPI

Respiratory Related Items -- RAD only Lab Test Results Template and Clinical Data Elements (CDEs)

- Guidance
- Template (sections) (note: CDEs are defined for all "fields")
 - Patient information
 - Provider information for in person visit
 - Date of testing
 - Person performing testing
 - Test conditions (e.g. receiving oxygen)
 - Testing
 - Arterial blood gas (at rest)
 - Arterial blood gas (during sleep or immediately upon awakening
 - Overnight oximetry
 - Signature

Questions?

General Comments/Recommendations?

Feedback and suggestions on the templates can be sent to: clinicaltemplates@cms.hhs.gov